

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**THE DRA PARTIES’
OBJECTIONS TO CONFIRMATION HEARING EXHIBIT LISTS**

To the Honorable United States District Court Judge Laura Taylor Swain:

AmeriNational Community Services, LLC (the “**Servicer**”), as servicer for the GDB Debt Recovery Authority (the “**DRA**”), and Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company (the “**Collateral Monitor**” and, together with the Servicer, collectively, the “**DRA Parties**”), which serves as the collateral monitor for Wilmington Trust, N.A. in connection with bonds the DRA issued, respectfully submit these Objections to Exhibit Lists in accordance with paragraph 3 of the *Amended Order Establishing Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith*, Dkt. No. 18394 (“**Amended Confirmation Procedures Order**”).²

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

² Unless otherwise indicated, all docket references herein refer to the docket of Case No. 17-BK-3283 (LTS).

1. The DRA Parties incorporate by reference the objections and reservations set forth in their earlier pretrial filings (*see, e.g.*, Dkt. No. 18675, 18836) and further object to the following exhibits identified in the *Monolines’ Informative Motion Submitting Exhibit List in Connection with the Plan Confirmation Hearing*, Dkt. No. 18682 (“**Monolines’ Exhibit List**”) as set forth in the chart below.³

Exhibit No.	Document Description Provided in the Monolines’ Exhibit List	Basis for the DRA Parties’ Objection
Monolines Ex. 1	Resolution No. 68-18, Adopted June 13, 1968, Authorizing and Securing Highway Revenue Bonds	Relevance
Monolines Ex. 2	Resolution No. 98-06, Adopted February 26, 1998, Authorizing and Securing Transportation Revenue Bonds	Relevance
Monolines Ex. 3	HTA Resolution No. 83-01	Relevance
Monolines Ex. 4	HTA Resolution No. 98-08	Relevance
Monolines Ex. 5	Resolution 2002-04 excerpted from closing binder for HTA Series D, Series E, Series F Bonds (Feb. 7, 2002)	Relevance
Monolines Ex. 6	Closing binder containing documents from the 2002 HTA bond issuance of Series D, Series E, Series F Bonds (Feb. 7, 2002)	Relevance
Monolines Ex. 7	Security Agreement by and between HTA and Owners of Transportation Revenue Bonds, dated February 7, 2002 and UCC-1 filed by HTA	Relevance
Monolines Ex. 8	HTA Resolution 2003-23, Authorizing 2003 Revenue Refunding Bonds Series AA	Relevance
Monolines Ex. 9	HTA Resolutions, including Resolution 2003-30 at HTA_STAY0004474-75	Relevance

³ Notwithstanding the DRA Parties’ objections (and consistent with the DRA Parties’ reservation of rights contained in their Pretrial Informative Motion, Dkt. No. 18836 ¶ 7), the DRA Parties reserve the right to introduce, use, or rely upon any of the exhibits listed on the Monolines’ Exhibit List at trial or in submissions to the Court.

Exhibit No.	Document Description Provided in the Monolines' Exhibit List	Basis for the DRA Parties' Objection
Monolines Ex. 10	Official Statement for HTA Series AA Bonds Issued Pursuant to 1968 Resolution, dated April 10, 2003	Relevance
Monolines Ex. 11	Official Statement, HTA 1977 Series L Highway Revenue Bonds	Relevance
Monolines Ex. 12	Official Statement, Series Y&Z Highway Bonds	Relevance
Monolines Ex. 13	2010 Reoffering Circular re: Series AA Bonds	Relevance
Monolines Ex. 14	GDB4 Resolution EC-2010-18	Relevance
Monolines Ex. 15	GDB Resolution 9179-A	Relevance
Monolines Ex. 16	GDB Resolution EC-1697	Relevance
Monolines Ex. 17	HTA Resolution No. 2008-31	Relevance
Monolines Ex. 18	GDB Resolution 8804	Relevance
Monolines Ex. 19	GDB Resolution 9195	Relevance
Monolines Ex. 20	GDB Resolution 9296	Relevance
Monolines Ex. 21	HTA Resolution Num. 2010-15	Relevance
Monolines Ex. 22	HTA Resolution No. 2010-19	Relevance
Monolines Ex. 23	HTA Resolution 2009-01	Relevance
Monolines Ex. 24	GDB Resolution 9024	Relevance
Monolines Ex. 25	GDB Resolution EC-2009-05	Relevance
Monolines Ex. 26	HTA Resolution 2009-24	Relevance
Monolines Ex. 27	HTA Resolution 2008-13	Relevance
Monolines Ex. 28	Letter from GDB to HTA dated 11/10/09	Relevance
Monolines Ex. 29	Letter from GDB to HTA dated 8/1/2018	Relevance
Monolines Ex. 30	Letter from GDB to HTA dated 6/24/10	Relevance

Exhibit No.	Document Description Provided in the Monolines' Exhibit List	Basis for the DRA Parties' Objection
Monolines Ex. 31	Letter from GDB to HTA dated 10/6/09	Relevance
Monolines Ex. 32	Letter from GDB to HTA dated 1/26/09	Relevance
Monolines Ex. 33	Spreadsheet Tracking HTA Revenues 2017-2020	Relevance
Monolines Ex. 34	AAFAF FY16-FY21 HTA Flow of Funds Summary	Relevance
Monolines Ex. 35	March 19, 2008 Loan Agreement and Amendments	Relevance
Monolines Ex. 36	August 6, 2008 Loan Agreement and Amendments	Relevance
Monolines Ex. 37	October 30, 2009 Loan Agreement and Amendments	Relevance
Monolines Ex. 38	October 30, 2009 Loan Agreement II and Amendments	Relevance
Monolines Ex. 39	October 30, 2009 Amended and Restated Loan Agreement and Amendments	Relevance
Monolines Ex. 40	November 9, 2009 Loan Agreement and Amendments	Relevance
Monolines Ex. 41	June 30, 2010 Loan Agreement and Amendments	Relevance
Monolines Ex. 42	July 13, 2010 Loan Agreement and Amendments	Relevance
Monolines Ex. 43	August 27, 2010 Loan Agreement and Amendments	Relevance
Monolines Ex. 44	August 27, 2010 Loan Agreement II	Relevance
Monolines Ex. 45	August 28, 2013 Loan Agreement and Amendments	Relevance
Monolines Ex. 46	October 27, 2011 Spanish Language Loan Agreement and Amendments	Relevance
Monolines Ex. 47	November 29, 2011 Spanish Language Loan Agreement and Amendments	Relevance

Exhibit No.	Document Description Provided in the Monolines' Exhibit List	Basis for the DRA Parties' Objection
Monolines Ex. 48	September 12, 2012 Spanish Language Loan Agreement and Amendments	Relevance
Monolines Ex. 49	February 28, 2013 Spanish Language Loan Agreement and Amendments	Relevance
Monolines Ex. 50	January 16, 2014 Spanish Language Loan Agreement and Amendments	Relevance
Monolines Ex. 51	GDB-HTA Promissory Notes	Relevance
Monolines Ex. 52	GDB Assignment and Security Agreement and Amendments	Relevance
Monolines Ex. 53	UCC-1 Financing Statement filed by HTA, August 2013 and Financing Statement Amendment	Relevance
Monolines Ex. 54	UCC Financing Statements filed by Puerto Rico Highway and Transportation Authority	Relevance
Monolines Ex. 55	GDB Qualifying Modification Solicitation Statement, August 9, 2018	Relevance
Monolines Ex. 56	HTA Audited Financial Statements – 2008-2019 (2010, 2014, 2015, 2019 HTA Audited Financial Statements are available on the EMMA online database)	Relevance
Monolines Ex. 57	Commonwealth Financial Statements 1998-2018 (Commonwealth Financial Statements from 1998-2018 are available on the Departamento de Hacienda website)	Relevance
Monolines Ex. 58	Official Statement for HTA Series M and Series N Transportation Revenue Bonds issued pursuant to 1998 Resolution	Relevance

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of October, 2021.

CERTIFICATE OF SERVICE: In accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's *Fifteenth Amended Notice, Case Management and*

Administrative Procedures Order (Dkt. No. 17127-1) (the “**CMP Order**”), we hereby certify that a true and exact copy of the foregoing was sent by electronic mail upon all the parties listed in the Master Service List and by U.S. mail upon all the Standard Parties listed in the CMP Order.

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